UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION

MDL No. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

MOTION BY DEFENDANTS PHARMACIA CORPORATION AND PFIZER INC. FOR ADMISSION OF COUNSEL PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), Mark D. Smith, a member of the bar of this Court, moves that the Court issue an Order for the following attorney to appear on behalf of the defendants Pharmacia Corporation and Pfizer Inc. and to practice before this Court in the above-titled actions:

Erica Smith-Klocek

As grounds for this Motion, the undersigned counsel respectfully represents that Ms. Klocek is a member in good standing of the bar of the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of New York.

As is further stated in the accompanying certificates, there are no disciplinary proceedings pending against Ms. Smith-Klocek as a member of the bar in any jurisdiction, and Ms. Smith-Klocek is familiar with the Local Rules of the United States District Court for the District of Massachusetts. In further support of this Motion, Ms. Smith-Klocek has submitted herewith her Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves for the admission of

Ms. Smith-Klocek to practice before this Court pro hac vice.

Respectfully submitted, PHARMACIA CORPORATION; PFIZER INC. by its attorney,

Mark D. Smith (BBO# 542676)

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Dated: August 23, 2005

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE PHARMACEUTICAL INDUSTRY: AVERAGE WHOLESALE PRICE:

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THIS DOCUMENT RELATES TO ALL ACTIONS

JUDGE PATTI B. SARIS

CERTIFICATE OF GOOD STANDING

Erica Smith-Klocek, an associate with the firm Morgan, Lewis & Bockius LLP, 1701 Market Street, Philadelphia, Pennsylvania, 19103-2921, hereby certifies:

- 1. I am a member of the State Bars of Pennsylvania and New York.
- 2. I have been admitted to practice before the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of New York.
- 3. I am a member of the Bar in good standing in every jurisdiction in which I have been admitted to practice.
- 4. There are no disciplinary proceedings against me as a member of the Bar in any jurisdiction.
- 5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Under penalty of perjury this 19th day of August, 2005.

Respectfully submitted,

Erica Smith-Klocek MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

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